

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DOLORES (DEE) BARRETT	:	CIVIL ACTION
	:	
v.	:	NO. 02-CV-4421
	:	
THE GREATER HATBORO CHAMBER	:	
OF COMMERCE, INC., JOHN J. (BUD)	:	
AIKEN, and MICKEY GLANTZ	:	JURY TRIAL DEMANDED

**PLAINTIFF'S MOTION FOR LEAVE TO FILE ADDENDUM TO BRIEF
OPPOSING DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Dolores (Dee) Barrett, by and through her attorney, Anita F. Alberts, Esquire, respectfully requests this Court to grant her leave to file an Addendum to her Brief Opposing Defendants' Motion for Summary Judgment, which is attached hereto as Exhibit A. In support of this Motion, Plaintiff states as follows:

Subsequent to filing Plaintiff's Answer and Brief Opposing Summary Judgment in this action, undersigned counsel learned that the Honorable Yvette Kane, U.S. District Judge in the Middle District of Pennsylvania entered Judgment for Plaintiff on a Jury Verdict in EEOC and Marion Shaub v. Federal Express Corporation, No. 1:02-cv-1194 (M.D. Pa. January 18, 2005), a sexual harassment and employment discrimination case, including an award of \$950,000.00 punitive damages under the Pennsylvania Equal Rights Amendment (PERA). It controls this case.

WHEREFORE, Plaintiff respectfully requests that this Court grant her leave to file the Addendum to her Brief Opposing Defendants' Motion for Summary Judgment.

Respectfully submitted,

Date: _____

Anita F. Alberts, Esquire
Attorney I.D. #28086
Attorney for Plaintiff